

SEP 28 1999

1386

sacramento
river



preservation
trust

September 23, 1999

Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Breitenbach,

The Sacramento River Preservation Trust (Trust) would like to take this opportunity to submit the following comments concerning the Draft Programmatic EIS/EIR for the CALFED Bay-Delta Program:

1. The Trust is a **strong** supporter of acquisition and restoration activities within the floodplain of the Sacramento River. In particular, the Trust supports the goals of the SB 1086 Program and would request that significant financial resources be dedicated to meeting the goals of that program.
2. There is a lack of adequate metering for water being used in both urban and agricultural areas. A comprehensive monitoring program relative to agricultural water use, especially within the federal Central Valley Project service area, must be put in place as part of a credible water conservation program. On the urban side, state law should be amended to require metering of all municipal water systems on an individual user basis.
3. No new surface water storage facilities should be built until California's water demand (as presented in Bulletin 160) is independently verified by a panel of third party experts. In addition, the potential ecological impacts from proposed diversions to offstream reservoirs during high flows needs further analysis.
4. The concept of "demonstration watersheds" needs further amplification, especially its relationship to the lack of a comprehensive watershed support program state-wide. The identification of significant new financial resources in the area of watershed restoration is also called for.



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5. Projected population growth within the state of California and what can be done about it must be addressed in order for the goals of the CALFED program to make any sense.

6. The twenty to thirty year timeframe of this programmatic EIS/EIR is too long from the standpoint of adequacy. The scope of the document should be limited to the first seven years (Stage 1), with a supplemental review beginning within five years of initial approval of the proposed programmatic EIS/EIR.

The Trust appreciates having had the opportunity to submit these comments and hereby requests that we be provided with a response to the above concerns prior to the final adoption of the programmatic EIS/EIR.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Merz', with a stylized flourish extending to the right.

John Merz
Chair, Board of Directors